

WALLER LANSDEN DORTCH & DAVIS

A PROFESSIONAL LIMITED LIABILITY COMPANY

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D. Billye Sanders
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March 13, 1998

Via Hand-Delivery

K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance ("InterLATA") Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996; Docket No. 97-00309 - Performance Measures and Standards and Technical Workshop

Dear Mr. Waddell:

Attached are fourteen (14) copies of a list of Initial Performance Parity Measurements, which if adopted would provide the Authority and competing local exchange carriers ("CLECs") quantifiable basis for determining whether BellSouth was providing the required parity. These measurements should be provided for the following: individual CLECs (e.g., performance provided by BellSouth to TCG MidSouth, Inc.); CLECs in the aggregate; the top three interexchange carriers; BellSouth's top 100 customers; BellSouth's retail customers; and BellSouth's affiliates (including its CLEC affiliate). These reports should be disaggregated by rate center in most incidences to provide a fair and accurate "apples to apples" measurement of performance. These performance measures should be revised and expanded over time as CLECs and ILECs gain more experience with interconnection and new technologies and services are introduced.

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With respect to the Performance Measurements Technical Workshop scheduled for March 23 through 24, 1998, TCG MidSouth respectfully requests that it will be scheduled to make its presentation on Tuesday, March 24.

Sincerely,

A handwritten signature in cursive script that reads "D. Billye Sanders".

D. Billye Sanders

DBS:lmb
w/Enclosures

cc: Parties of Record

INITIAL PERFORMANCE PARITY MEASUREMENTS

<u>Item No.</u>	<u>Performance Criteria</u>	<u>Unit of Measure</u>
Pre-Ordering		
1	Pre-Ordering Office (SPOC) Access within 20 Seconds	Percentage
2	Pre-Order Information System Availability	Percentage
3	Obtain Service Availability via a System Interface	Seconds
4	Obtain Appointment Schedule via a System Interface	Seconds
5	Obtain Customer Service Record (CSR) via a System Interface	Seconds
Order Provisioning		
6	Order Provisioning Office (SPOC) Access within 20 Seconds	Percentage
7	Order Provisioning Information System Availability	Percentage
8	Average Installation Interval	No. of Days
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
9	FOC Interval	No. of Hrs
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
10	Installation Commitments Met	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
11	Installation Desired Due Date Met	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
12	Installation New Service Trouble within 7-days of install	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	

This initial list of Performance Parity Measurements will have to be supplemented and expanded over time as experience with CLEC-ILEC interconnection grows and new technologies and services are introduced.

INITIAL PERFORMANCE PARITY MEASUREMENTS

<u>Item No.</u>	<u>Performance Criteria</u>	<u>Unit of Measure</u>
13	Installation Disconnect Commitments Met	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
14	Held Orders Compared to Total Orders Placed	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
15	Held Orders < 30-Days to Total Orders Placed	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
16	Held Orders > 90-Days to Total Orders Placed	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
17	Average Held Order Interval to Completion Date	Days
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
18	Customer Affecting Coordinated Conversion Window Violations	Percentage
Maintenance/Repair		
19	Maintenance/Repair Office (SPOC) Access within 20 Seconds	Percentage
20	Maintenance/Repair Information System Availability	Percentage
21	Mean-Time-To-Restore (MTTR)	Hours
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	

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INITIAL PERFORMANCE PARITY MEASUREMENTS

<u>Item No.</u>	<u>Performance Criteria</u>	<u>Unit of Measure</u>
22	Out-Of-Service Cleared >= 3 Hours	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
23	Out-Of-Service Cleared >= 12 Hours	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
24	Repair Commitments Met	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
25	Repeat Trouble Rate w/in 30-Days of Previous Trouble	Percentage
	DS-0	
	DS-1	
	DS-3	
	Analog Loops	
	Digital Capable Loops	
26	Hi-Cap Failure Rate: Troubles Per Installed Base	Percentage
	DS-0	
	DS-1	
	DS-3	
27	Outages Due To Loop Failure: Per 100 Lines	Percentage
	Analog Loops	
	Digital Capable Loops	
28	Status Calls According to ILEC Processes	Percentage
29	Customer Affecting Maintenance Window Violations	Percentage

Billing

30	Timeliness of Usage Billing - Usage	No. of Days
31	Billing Records Delivered in Weekly Increments w/in 2-Days - Usage	Percentage
32	Respond to Billing Inquiry w/in 24-Hours	Percentage
33	Accuracy of Payphone Rating Table	Percentage
34	ILEC End User Calls Misrated by Called-To Carrier	Percentage

This initial list of Performance Parity Measurements will have to be supplemented and expanded over time as experience with CLEC-ILEC interconnection grows and new technologies and services are introduced.

INITIAL PERFORMANCE PARITY MEASUREMENTS

<u>Item No.</u>	<u>Performance Criteria</u>	<u>Unit of Measure</u>
Operator Services		
35	Mean Time To Answer	Seconds
36	Mean Hold Time	Seconds
37	Call Abandonment (Hang-up)	Percentage
38	Call Blockage	Percentage
39	Average Work Time	Min. or Sec.
Directory Assistance		
40	Mean Time To Answer	Seconds
41	Mean Hold Time	Seconds
42	Call Abandonment (Hang-up)	Percentage
43	Call Blockage	Percentage
44	Average Work Time	Min. or Sec.
Network Performance		
45	Failure Frequency of Local Interconnection Trunks	Percentage
46	Calls Blocked to Calls Attempted	Percentage
	Local	
	Toll	
	Meet Point Trunks	
Interconnect/Unbundled Elements/Combinations Performance		
47	SS-7 A-Link Availability	Percentage
Code Opening		
48	NXX Loaded and Tested Prior to LERG Effective Date	Percentage
49	MTTR For NXX Troubles	Hours
Emergency Service (911)		
50	ALI Database Update w/in 24-Hours	Percentage
51	Selective Router Update w/in 24-Hours	Percentage
52	ALI Database Update Accuracy	Percentage
53	Selective Router Update Accuracy	Percentage
54	MSAG System Access Response Time	Seconds
Directory Listings		
55	Directory Listings Database Update Completion Interval	Days
56	Directory Listings Database Update w/in 24-Hours	Percentage
57	Directory Listings Electronic Interface Availability	Percentage

This initial list of Performance Parity Measurements will have to be supplemented and expanded over time as experience with CLEC-ILEC interconnection grows and new technologies and services are introduced.